

DOCKET FILE COPY ORIGINAL

WC 07-295

Stamp &  
Return

**Thomas Lynch & Associates  
Attorneys at Law**

The Crosby Building  
705 Melvir Avenue, Suite 104  
Annapolis, Maryland 21401

FCC/MELLON

DEC 14 2007

DIRECT (410) 349-4990 x 100  
TLYNCH@TELECOMLAWYERS.COM

Admitted in  
MD, VA & DC

December 13, 2007

VIA UPS

Federal Communications Commission  
Wireline Competition Bureau  
CPD-214 Applications  
P.O. Box 358145  
Pittsburg, PA 15251-5154

Re: Joint Application for Transfer of Control of Domestic and International Section 214  
Authorizations of eGix, Inc. and eGix Network Services, Inc.

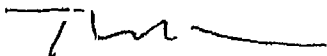
Dear Sir or Madam:

Enclosed please find one copy of the Joint Application for Transfer of Control of Domestic and International Section 214 Authorizations of eGix, Inc. and eGix Network Services, Inc. Also enclosed please find the Form 159 remittance for the transfer of control of the domestic 214 authorizations in this application. The applicants will make additional filings via the Commission's IBFS system for the transfers of control of the international 214 authorizations, along with the associated online payments therefor.

Copies of this Application are being sent to the Commission's Secretary for processing. Please stamp and return the additional copy of this letter included herewith. A self-addressed, stamped envelope is included for that purpose.

Any questions about the enclosed application or payment may be directed to the undersigned at (410) 349-4990.

Sincerely,



Thomas M. Lynch  
Counsel for eGix

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

**eGix Network Services, Inc.  
(FRN 0004999215),**

**eGix, Inc.  
(FRN 004999223)**

and

**Cincinnati Bell Any Distance Inc.  
(FRN 0003729340)**

for grant of authority to complete a  
transfer of the assets of eGix, Inc. and  
eGix Network Services, Inc., both of which  
are authorized domestic and  
international carriers, to Cincinnati  
Bell Any Distance Inc.

File No. \_\_\_\_\_

**JOINT APPLICATION FOR ASSIGNMENT  
OF INTERNATIONAL 214 AUTHORIZATIONS AND TRANSFER OF  
CONTROL OF DOMESTIC SECTION 214 AUTHORIZATIONS**

eGix Network Services, Inc. ("ENS") (FRN 0004999215), eGix, Inc. ("eGix") (FRN 0004999223) and Cincinnati Bell Any Distance Inc. ("CBAD") (FRN 0003729340) (collectively, "Applicants"), through their undersigned counsel and pursuant to Section 214 of the Communications Act, as amended (the "Act"), 47 U.S.C. § 214, and Sections 63.04, 63.18 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.18 and 63.24, respectfully request Commission consent for the Applicants to consummate a transaction whereby CBAD will acquire all of the assets of ENS and eGix

and thereafter will continue to provide services to the respective former customers of ENS and eGix.

This Application seeks authority for the assignment of international Section 214 authority and a transfer of control of domestic Section 214 authority as follows:

First, this Application seeks authority related to the global or limited global facilities-based and resale Section 214 authority to provide international services held by eGix, FCC File No. ITC-214-20010921-00492, as well as the global or limited global facilities-based and resale Section 214 authority to provide international services held by ENS, FCC File No. ITC-214-20010921-00493.

Second, this Application seeks Commission consent to transfer control of the domestic interstate Section 214 authority held by each of eGix and ENS, respectively, in connection with a transfer of the assets and customers of those entities.

As set forth in greater detail below, the Applicants request expedited review and processing of this application to allow the Applicants to complete the proposed transaction as soon as possible.

**1. Description of the Parties and the Transaction**

eGix is a corporation formed under the laws of the state of Indiana. ENS is also a corporation formed under the laws of the state of Indiana. ENS provides interstate and intrastate long distance services, resold local exchange services and internet protocol based voice services, primarily to business customers in Indiana and Illinois. eGix resells the services of ENS to various other business customers in Indiana and Illinois.<sup>1</sup>

---

<sup>1</sup> See Attachment 1 showing the service areas covered by eGix and ENS, and the services provided therein.

CBAD is an indirect wholly-owned subsidiary of Cincinnati Bell Inc.,<sup>2</sup> an Ohio corporation which is the 100% owner of Cincinnati Bell Telephone Company LLC, an Ohio limited liability company and the incumbent local exchange carrier for certain exchanges in Ohio, Kentucky and Indiana.<sup>3</sup> CBAD provides interstate long distance services throughout the United States, and intrastate long distance and resold local exchange services, and internet protocol based voice services, in various exchanges to business customers in Kentucky, Indiana and Ohio.

Pursuant to an Asset Purchase Agreement dated November 30, 2007, CBAD will acquire substantially all the assets of eGix and ENS. Following the acquisition of the assets, CBAD will continue to provide services to all the former customers of eGix and ENS. The transaction will not adversely affect any of the customers who received services from eGix or ENS. Immediately following the consummation of the transaction, those customers will continue to receive services under the same rates, terms and conditions of service as existed prior to the transaction. Because the customer-facing brand will ultimately change as a result of the transaction, CBAD will fully comply with the requirements of Section 64 of the Commission's Rules, 47 C.F.R. §§ 64.1100-1195, and any applicable state rules.

## **2. Public Interest Statement**

Applicants respectfully submit that the proposed transaction serves the public interest, convenience and necessity. CBAD will provide extensive financial resources

---

<sup>2</sup> CBAD is directly and wholly owned by Cincinnati Bell Technology Solutions Inc., a Delaware corporation wholly owned by BRCOM Inc., also a Delaware corporation which is wholly owned by Cincinnati Bell Inc.

<sup>3</sup> See Attachment 2 showing the service areas covered by CBAD and its affiliates, and the services provided therein.

and management expertise to expand the service offerings and capabilities to the former customers of eGix and ENS, thereby creating increased competition and enhanced service capabilities in the telecommunications market. Although the acquisition by CBAD, of the assets and customers of eGix and ENS, may result in a larger provider of telecommunications services in the markets served by all three entities, such combination will serve to increase competition because neither CBAD nor eGix nor ENS, nor any of their affiliates, is or would be dominant in the provision of telecommunications services in any market currently served by eGix or ENS. The resources of CBAD will provide added competition to the incumbent local exchange carriers in the markets that eGix and ENS now serve. And as indicated in Section 4(a)(8) of this Application, although CBAD is wholly owned by an entity that owns Cincinnati Bell Telephone Company LLC, an incumbent local exchange carrier, neither eGix nor ENS provides services in the exchanges served by Cincinnati Bell Telephone Company LLC and therefore competition is not diminished in those territories where it is considered dominant.

Moreover, the Applicants seek expedited treatment in processing this application related to domestic and international 214 authority. Prompt completion of the proposed transaction is critical to ensuring that the Applicants can obtain the benefits described in this Application. Accordingly, the Applicants respectfully request that the Commission approve this Application expeditiously in order to permit the Applicants to consummate the proposed transaction as promptly as possible.

3. Information About the Transferors/Assignors and Transferee/Assignee

The following information is submitted pursuant to Sections 63.04(b), 63.24(e) and 63.18 of the Commission's Rules, 47 C.F.R. §§ 63.04(b), 63.24(e) and 63.18:

(a) The name, address and telephone number of the transferors/assignors (hereinafter called "transferors") and transferee/assignee (hereinafter called "transferee"):

The transferors:

eGix, Inc.  
Attn: Steven L. Johns  
Chief Executive Officer  
11550 N. Meridian Street, Suite 500  
Carmel, IN 46032  
(317) 290-3880

eGix Network Services, Inc.  
Attn: Steven L. Johns  
Chief Executive Officer  
11550 N. Meridian Street, Suite 500  
Carmel, IN 46032  
(317) 290-3880

The transferee:

Cincinnati Bell Any Distance Inc.  
Attn: D. Scott Ringo, Jr.  
Assistant Corporate Secretary  
221 East Fourth Street, Room 1280  
Cincinnati, OH 45201  
(513) 397-1354

(b) Transferor eGix, Inc. is organized under the laws of the state of Indiana. Transferor eGix Network Services, Inc. is organized under the laws of the state of Indiana. The transferee, Cincinnati Bell Any Distance Inc. is organized under the laws of the state of Delaware.

(c) Correspondence concerning this application should be addressed as follows:

For the transferors, eGix, Inc. and eGix Network Services, Inc.:

Thomas M. Lynch  
Thomas Lynch & Associates  
The Crosby Building  
705 Melvin Avenue, Suite 104  
Annapolis, MD 21401  
(410) 349-4990 x 100  
tlynch@telecomlawyers.com

with a copy to:

eGix, Inc.  
Attn: Thomas P. Dakich  
General Counsel  
11550 N. Meridian Street, Suite 500  
Carmel, IN 46032  
(317) 290-7680  
tdakich@dakichlaw.com

For the transferor, Cincinnati Bell Any Distance Inc.

Cincinnati Bell Any Distance Inc.  
Attn: D. Scott Ringo, Jr.  
Assistant Corporate Secretary  
221 East Fourth Street, Room 1280  
Cincinnati, OH 45201  
(513) 397-1354  
scott.ringo@cinbell.com

(d) Transferor eGix has an international Section 214 authorization<sup>4</sup> and a domestic Section 214 authorization. Transferor eGix Network Services, Inc. has an international Section 214 authorization<sup>5</sup> and a domestic Section 214 authorization.

---

<sup>4</sup> See ITC-214-20010921-00492 for global or limited global facilities-based and resale Section 214 authority.

<sup>5</sup> See ITC-214-20010921-00493 for global or limited global facilities-based and resale Section 214 authority.

Transferee CBAD has an international Section 214 authorization<sup>6</sup> and a domestic Section 214 authorization.

(h) The ownership of the transferee,<sup>7</sup> CBAD, is as follows: CBAD is owned 100% by Cincinnati Bell Technology Solutions Inc., a Delaware corporation. Cincinnati Bell Technology Solutions Inc. is owned 100% by BRCOM Inc., a Delaware corporation. BRCOM Inc. is owned 100% by Cincinnati Bell Inc., an Ohio corporation. Cincinnati Bell Inc. is a publicly traded entity with no person or entity owning 10% or more, directly or indirectly, of its outstanding voting shares. The Directors of Cincinnati Bell Inc. are Phillip R. Cox (Chairman), Bruce L. Byrnes, John F. Cassidy, Robert W. Mahoney, Daniel J. Meyer, Michael G. Morris, David B. Sharrock, Alex Shumate and John M. Zrno. Each of these individuals is a U.S. citizen. The address for each of the entities and persons set forth above is 221 East Fourth Street, Room 1280, Cincinnati, OH 45201 and the principal business of each is telecommunications.

Neither CBAD, eGix nor ENS, nor any of their affiliates, has any interlocking directorates with a foreign carrier.

---

<sup>6</sup> See ITC-214-20071024-00434 for global or limited global facilities-based and resale Section 214 authority. Following the closing of the transaction, CBAD will provide international services to the former eGix and ENS customers under its own Section 214 authority, ITC-214-20071024-00434, and will surrender the international Section 214 authorizations assigned by eGix and ENS (ITC-214-20010921-00492 and ITC-214-20010921-00493).

<sup>7</sup> The ownership of the transferors eGix and ENS is identical. Each is owned by the following individuals, who have 10% or more of the ownership interests of both eGix and ENS and hold the same percentage in each entity: John F. Hays (33%), U.S. citizen; Laurence W. Grabb Credit Trust (33%), Indiana Trust with Jeffrey Peek as Trustee, U.S. citizen, and Sally Grabb as beneficiary, U.S. citizen; Steven L. Johns (16%), U.S. citizen; James H. Kinnett (12%), U.S. citizen. Each of these owners has an address of 11550 N. Meridian Street, Suite 500, Carmel, IN 46032 and each has a principal business of telecommunications, except the trust, the principal business of which is to serve as a trust.



(i) Applicants hereby certify, respectively, that neither CBAD, eGix nor ENS, nor any of their affiliates, has any affiliation with a foreign carrier, nor is any of them a foreign carrier.

(j) Applicants hereby certify, respectively, that neither CBAD, eGix nor ENS, nor any of their affiliates (1) seeks to provide international telecommunications services to any destination country for which it is a foreign carrier in that country, (2) controls a foreign carrier in a destination country, (3) is owned by any entity, that owns more than 25 percent of it, or that controls it, that also controls a foreign carrier in a destination country, or (4) is owned by two or more foreign carriers (or parties that control foreign carriers) that own, in the aggregate, more than 25 percent of it, and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable.

(l) Not applicable. Neither CBAD, eGix nor ENS proposes to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where it is a foreign carrier or is affiliated with a foreign carrier.

(m) Not applicable. Neither CBAD, eGix nor ENS is or is affiliated with a foreign carrier.

(n) CBAD, eGix and ENS each hereby certifies that neither it nor its affiliates has agreed to accept any special concessions, directly or indirectly, from any foreign carrier with respect to any U.S. – international route where the foreign carrier possesses

market power on the foreign end of the route and will not enter into such agreements in the future.

(o) CBAD, eGix and ENS each hereby certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001 – 1.2003, that neither it nor any of its affiliates or owners is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

(p) CBAD, eGix and ENS each desires streamlined processing pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. § 63.12. The Application qualifies for streamlined processing for the reasons set forth below in Section 4 pertaining to the domestic transfer of control, and, with respect to the assignment of the international Section 214 authorizations, because neither CBAD, eGix nor ENS is affiliated with a foreign carrier in a destination market.

#### **4. Domestic Transfer of Control**

In lieu of an attachment to this application, pursuant to Section 63.04(b), the following information is submitted pursuant to Sections 63.04(a)(6) through (a)(12), 47 C.F.R. §§ 63.04(a)(6) – (a)(12).

(a)(6) A description of the transaction is set forth in Section 1 of this Application.

(a)(7) The geographic areas in which the transferors, eGix and ENS, and their respective affiliates, offer domestic telecommunications services, and the services provided in each area, is set forth in Attachment 1. There are no other telecommunications services offered by any affiliate of either eGix or ENS other than as set forth on Attachment 1. The geographic areas in which the transferee, CBAD, and its

affiliates, offer domestic telecommunications services, and the services provided in each area, is set forth in Attachment 2. There are no other telecommunications services offered by any affiliate of CBAD other than as set forth on Attachment 2.

(a)(8) With respect to domestic interstate services, the Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(ii) of the Commission's Rules, 47 C.F.R. §§ 63.03(b)(2)(ii), because (1) the transferee, CBAD, and its affiliates, have a market share in the interstate, inter-exchange market of less than 10 percent, and the transferee, CBAD, would provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by dominant local exchange carriers that are not a party to the transaction, and (2) although an affiliate of the transferee CBAD, Cincinnati Bell Telephone Company LLC, is a dominant carrier in certain exchanges of Ohio and Kentucky, as indicated on Attachment 2, the transferors, eGix and ENS, are non-dominant carriers that provide services exclusively outside the geographic area where Cincinnati Bell Telephone Company LLC is dominant, as indicated in Attachment 2.

(a)(9) Through this Application, the Applicants seek authority with respect to both international and domestic Section 214 authorizations. Applicants will complete the online filing requirements pertaining to assignments of international Section 214 authorizations and will include this Application as an attachment to those online applications. No other applications are being filed with the Commission in connection with the proposed transaction.

(a)(10) The Applicants are not requesting special consideration because a party to the transaction is facing imminent business failure.

*(a)(11) Not applicable. No separately-filed waiver requests are being sought in conjunction with the transaction.*

(a)(12) A statement showing how granting this Application will serve the public interest, convenience and necessity is provided in Section 2 above.

5. Conclusion

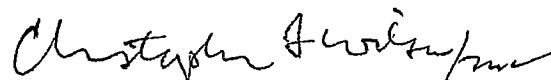
For the reasons set forth in this Application, the Applicants respectfully request expeditious approval of the transfer of assets of eGix, Inc. and eGix Network Services, Inc. to Cincinnati Bell Any Distance Inc., including, therewith, the requisite authority to transfer control of the domestic Section 214 authorizations held by eGix, Inc. and eGix Network Services, Inc., and to assign the international Section 214 authorizations held by eGix, Inc. and eGix Network Services, Inc.

Respectfully submitted,



Thomas M. Lynch, Esq.  
Law Office of Thomas M. Lynch  
The Crosby Building  
705 Melvin Avenue, Suite 104  
Annapolis, MD 21401  
(410) 349-4990  
[tlynch@telecomlawyers.com](mailto:tlynch@telecomlawyers.com)

Counsel for eGix, Inc. and  
eGix Network Services, Inc.



Christopher J. Wilson, Esq.  
General Counsel  
221 East Fourth Street, Room 1290  
Cincinnati, OH 45201  
(513) 397-6351

Counsel for Cincinnati Bell  
Any Distance Inc.

Dated December 13, 2007

**Attachment 1**  
**Services and Markets**  
**Served by eGix, Inc. and**  
**eGix Network Services Inc.**

See attached  
table and map

## eGix and eGix Network Services, Inc.

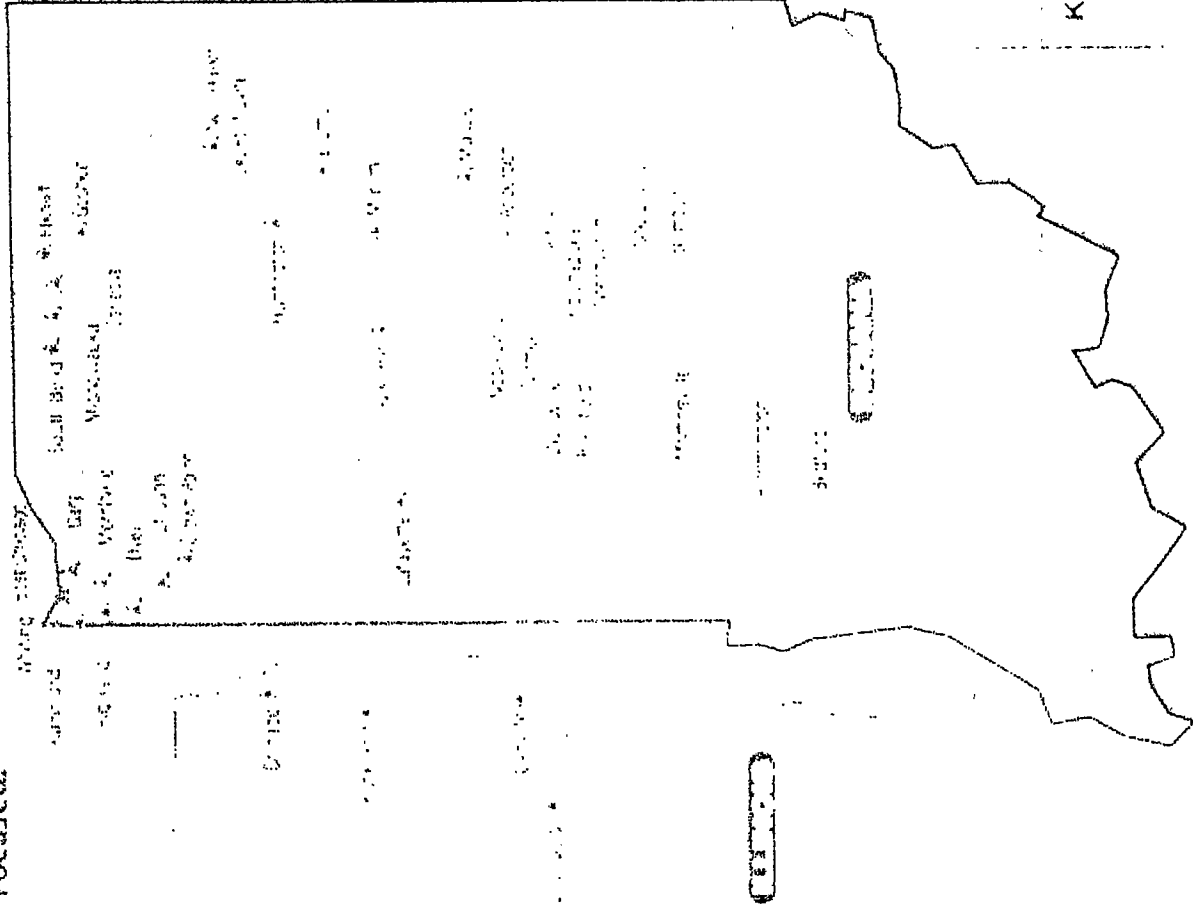
| Entity   | Service Area  | Services Provided   |
|--|---|---|
| <b>Egix Network Services, Inc.</b>             | Long Distance Services: Indiana and Illinois. Resale Local Exchange Services: Certified in Indiana, and Illinois. Facilities Based Local Exchange Services: Certified in Indiana and Illinois.(Note 1) VoIP Services: Indiana See attached Map for exchanges in Indiana and Illinois where services are provided. | Interstate and intrastate long distance services, resold local exchange PRI services (business only), resold local exchange POTS and Centrex services (business only), VoIP services.       |
| <b>Egix, Inc.</b>                              | Long Distance Services: Indiana and Illinois. Resale Local Exchange Services: Indiana and Illinois. VoIP Services: Indian.a See attached Map for exchanges in Indiana and Illinois where services are provided.   | Interstate and intrastate long distance services, resold local exchange PRI services (business only),resold local exchange POTS and Centrex services (business only) Resells VoIP services. |
| <b>Egix Network Services of Virginia, Inc.</b> | Certified as a CLEC in Virginia   | No services provided today  |

Notes: 1 ENS is a certified local exchange provider but does not currently provide any services on a facilities basis. All exchange services are resold.

All information is as of December 2007.

# CCIX COVERAGE MAP

Fast. Flexible. Focused.



KEY

CCIX





***Attachment 2***  
**Services and Markets**  
**Served by Cincinnati Bell**  
**Any Distance Inc. and its Affiliates**

See attached table

## Cincinnati Bell Inc. Entities Providing Regulated Telecommunications Services

| Entity   | Service Area  | Services Provided  |
|--|---|--|
| <b>Cincinnati Bell Telephone Company LLC (CBT)</b>     | Ohio Exchanges: Bethany, Bethel, Cincinnati, Clermont, Hamilton, Harrison, Little Miami, Newtonsville, Reily, Seven Mile, Shandon, and Williamsburg.<br>Kentucky Exchanges: Alexandria, Boone, Butler, Falmouth, Glencoe, Kentucky Metropolitan (Covington), Independence, Walton, Warsaw, and Williamstown.<br>Indiana Exchanges: Peoria, West Harrison. | Local exchange services and features (residence and business), directory assistance, operator services, switched access services, special access services, pole attachments and conduit occupancy, and intraLATA toll. |
| <b>Cincinnati Bell Extended Territories LLC (CBET)</b> | Ohio Exchanges: Beavercreek, Bellbrook, Centerville, Dayton, Fairborn, Franklin, Lebanon, Mason, Miamisburg - West Carrollton, Middletown, Monroe, Morrow, Oxford, South Lebanon, Springfield, Spring Valley, Trenton, Vandalia, Xenia.<br>(Note: Service in Spring Valley is grandfathered.)   | Local exchange services and features (residence and business), directory assistance, operator services, special access services, and intraLATA toll.   |
| <b>Cincinnati Bell Any Distance Inc. (CBAD)</b>        | Long Distance Services: All 48 contiguous states. Resale Local Exchanges Services: Certified in Kentucky, Indiana, and Ohio with customers in Ohio. (Note 1) Facilities Based Local Exchange Services: Pending certification in Indiana. VoIP Services: Kentucky, Indiana, and Ohio. (Note 2)   | Interstate and intrastate long distance services, resold local exchange PRI services (business only), VoIP services.   |
| <b>Cincinnati Bell Wireless LLC (CBW)</b>              | See attached table for BTAs in which CBW provides wireless services.  | Wireless services  |
| <b>BRCOM Inc.</b>                                      | Kentucky, Indiana, and Ohio - predominantly within the CBT service area. (Note 3)   | Payphone and AOS services  |

Notes: 1 CBAD has 4 local PRI resale customers in Ohio.

2 CBAD provides VoIP services to 187 customers in Ohio, 41 customers in Kentucky and 1 customer in Indiana.

3 Over 90% of BRCOM's payphones are within CBT's service area. BRCOM provides payphone services on 180 lines outside CBT's service area. 9 are in Indiana. 14 are in Kentucky. 157 are in Ohio.

All information is as of December 2007.

## PSC Broadband Licenses

| Call Sign | Holder  | Frequencies (MHz)                                  | Channel Block | Geographic area   |
|-----------|---------|--|---------------|---|
| WPOI243   | CBW LLC | 001850.0000-001865.0000<br>001930.0000-001945.0000 | A             | MTA018 Cincinnati-Dayton<br>BTA 081 Cincinnati (21 Counties)<br>BTA106 Dayton-Springfield (10 Counties) |
| KNLF900   | CBW Co. | 001885.0000-001890.0000<br>001965.0000-001970.0000 | E             | BTA 081   |

### BTA081 Counties:

Dearborn, IN  
 Franklin, IN  
 Ohio, IN  
 Ripley, IN  
 Switzerland, IN  
 Boone, KY  
 Bracken, KY  
 Campbell, KY  
 Gallatin, KY  
 Grant, KY  
 Kenton, KY  
 Mason, KY  
 Pendleton, KY  
 Adams, OH  
 Brown, OH  
 Butler, OH  
 Clermont, OH  
 Clinton, OH  
 Hamilton, OH  
 Highland, OH  
 Warren, OH

### BTA106 Counties:

Champaign, OH  
 Clark, OH  
 Darke, OH  
 Greene, OH  
 Logan, OH  
 Mercer, OH  
 Miami, OH  
 Montgomery, OH  
 Preble, OH  
 Shelby, OH

## Verifications

On behalf of eGix, Inc. and eGix Network Services, Inc., I, Steven L. Johns, hereby certify upon penalty of perjury that I am the Chief Executive Officer of eGix, Inc. and eGix Network Services, Inc., and that the statements in the foregoing Federal Communications Commission Section 214 Application are true, complete and correct to the best of my knowledge, and such statements are made in good faith.



---

Steven L. Johns, CEO  
eGix, Inc.  
eGix Network Services, Inc.  
Dated: December 13, 2007

On behalf of Cincinnati Bell Any Distance Inc., Cincinnati Bell Telephone Company LLC, Cincinnati Bell Extended Territories LLC, Cincinnati Bell Inc. and BRCOM Inc., I, Christopher J. Wilson, Esq., hereby certify upon penalty of perjury that I am the Corporate Secretary of such entities and that the statements in the foregoing Federal Communications Commission Section 214 Application are true, complete and correct to the best of my knowledge, and such statements are made in good faith.

---

Christopher J. Wilson, Esq.  
Corporate Secretary  
Cincinnati Bell Any Distance Inc.  
Cincinnati Bell Telephone Company LLC  
Cincinnati Bell Extended Territories LLC  
BRCOM Inc.  
Cincinnati Bell Inc.

Dated: December 13, 2007

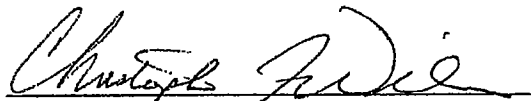
## Verifications

On behalf of eGix, Inc. and eGix Network Services, Inc., I, Steven L. Johns, hereby certify upon penalty of perjury that I am the Chief Executive Officer of eGix, Inc. and eGix Network Services, Inc., and that the statements in the foregoing Federal Communications Commission Section 214 Application are true, complete and correct to the best of my knowledge, and such statements are made in good faith.

---

Steven L. Johns, CEO  
eGix, Inc.  
eGix Network Services, Inc.  
Dated: December 13, 2007

On behalf of Cincinnati Bell Any Distance Inc., Cincinnati Bell Telephone Company LLC, Cincinnati Bell Extended Territories LLC, Cincinnati Bell Inc. and BRCOM Inc., I, Christopher J. Wilson, Esq., hereby certify upon penalty of perjury that I am the Corporate Secretary of such entities and that the statements in the foregoing Federal Communications Commission Section 214 Application are true, complete and correct to the best of my knowledge, and such statements are made in good faith.



---

Christopher J. Wilson, Esq.  
Corporate Secretary  
Cincinnati Bell Any Distance Inc.  
Cincinnati Bell Telephone Company LLC  
Cincinnati Bell Extended Territories LLC  
BRCOM Inc.  
Cincinnati Bell Inc.

Dated: December 13, 2007